

AUG 07 2006

REMARKS/ARGUMENTS

In the Office action dated April 5, 2006, claims 15 and 16 were allowed, claim 21 was objected to, and claims 1 – 11, 13, 14, 17 – 20, and 22 – 26 were rejected. In response, claims 1, 5, 8, 10, 11, and 19 have been amended, claims 27 and 28 have been added, and claims 6, 9, 17, 18, and 20 – 26 have been canceled. Applicant hereby requests reconsideration of the application in view of the amended claims, the added claims, and the below-provided remarks.

I. Allowable Subject Matter

Applicant notes with appreciation that claims 15 and 16 are deemed to be in allowable condition and that claim 21 would be allowable if rewritten to include the limitations of all intervening claims. Applicant has added new claim 27, which includes the limitations of claims 1, 2, 20, and 21 as provided in the amendment of January 9, 2006. Applicant asserts that new claim 27 is now in an allowable condition.

II. Claim Rejections Under 35 U.S.C. 102

In the Office action of April 5, 2006, claims 1 – 11, 13, 14, 17 – 20, and 22 – 26 were rejected under 35 U.S.C. 102(a) as being anticipated by Sawey et al. (U.S. Publ. No. 2002/0118668, hereinafter Sawey).

In general, Applicant has amended independent claims 1, 5, 8, and 11 to include similar limitations. The similar limitations as recited in claim 1 include “first and second *port-specific* offset values” that are generated “in response to the contents of *both* the first and second frame position registers.” The amendments particularly point out that the offset values are “*port-specific*” offset values and that the offset values are generated in response to “*both*” the first and second frame position registers. Support for the amendments is found, for example, at page 11, line 7 through page 12, line 13 and Tables 2 and 3.

With respect to claim 1, Applicant has amended claim 1 to include all of the limitations of claim 17 and 18 with the added limitations of "port-specific" and "both" as described above. Claim 1, as previously presented, was rejected in view of the pointer adders (850 and 860) and the counters (502) that are disclosed in Fig. 6 of Sawey. The controller recited in claim 17 was rejected in view of comparators (516 and 522) in Fig. 6 of Sawey and the first and second offset values recited in claim 18 were rejected in view of the offset (518) in Fig. 6 of Sawey.

Applicant asserts that claim 1, as amended, is not anticipated by Sawey because Sawey does not disclose "wherein the controller is configured to generate first *and* second *port-specific* offset values in response to the contents of *both* the first and second frame position registers."

Firstly, offsets (518) as disclosed by Sawey and cited in the Office action may be considered "port-specific" offset values, but they are not generated in response to the "both" the first and second frame position registers. Referring to Fig. 6 of Sawey, offsets (518) are output from comparator (516) in response to the PF pointer and the PG pointer of the respective pointer adders (850 or 860), not in response to the pointers of both pointer adders (850 and 860).

Secondly, combined offset (810) appears to be generated in response to both the PF pointer from pointer adder (850) and the PF pointer from pointer adder (860). However, the combined offset (810) is only one offset that is "forwarded to either pointer adder 850 or 860." [0069] That is, the combined offset, which is generated in response to the PF pointers from the pointer adders (850 and 860), is only a single offset as opposed to first and second port-specific offset values as recited in claim 1.

Because Sawey does not disclose "first *and* second offset values" that are "*port-specific*" and generated in response to "*both*" first and second frame position registers, claim 1 is not anticipated by Sawey.

Independent Claims 5, 9, and 11

Independent claims 5, 8, and 11 include similar limitations to claim 1. Because of the similarities between claim 1 and claims 5, 8, and 11, the remarks provided above with reference to claim 1 apply also to claims 5, 8, and 11.

Dependent Claims 2 – 4, 7, 10, 13, and 14

Applicant asserts that dependent claims 2 – 4, 7, 10, 13, and 14 are allowable at least based on their respective base claims.

III. New Claim 28

New claim 28 recites a method for synchronizing SONET/SDH switches as disclosed at page 10, lines 17 – 21, page 12, line 3 through page 13, line 6, and Fig. 6. Applicant asserts that Sawcy does not disclose the method as recited in new claim 28. In particular, Sawcy does not teach “normalizing the contents...”, “determining the largest propagation delay...”, and “determining port-specific offsets...” as recited in claim 28.

Applicant respectfully requests reconsideration of the claims in view of the claim amendments, the new claims, and the remarks made herein. A notice of allowance is earnestly solicited.

At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account **50-3444** pursuant to 37 CFR 1.25. Additionally, please charge any fees to Deposit Account **50-3444** under 37 CFR 1.16, 1.17, 1.19, 1.20 and 1.21.

Respectfully submitted,



Mark A. Wilson
Reg. No. 43,994

Date: August 7, 2006

Wilson & Ham
PMB: 348
2530 Berryessa Road
San Jose, CA 95132
Phone: (925) 249-1300
Fax: (925) 249-0111